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Counsel for Neal Richards Group, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: § § **BANKRUPTCY NO. 15-44791-MXM**
FPMC FORT WORTH REALTY § § **CHAPTER 11 PROCEEDING**
PARTNERS, LP, § §
DEBTOR. § §

JOINT MOTION FOR ENTRY OF SCHEDULING ORDER

TO THE HONORABLE MARK X. MULLIN, UNITED STATES BANKRUPTCY JUDGE:

Neal Richards Group, LLC (“NRG”), CH Realty VI/MO Austin FPMC, LP (“CH Realty”), FPMC Fort Worth Realty Partners, LP (“Debtor”), United States Trustee (“Trustee”), and certain limited partners (collectively, the “Limited Partner Objectors”) file this Joint Motion for Entry of Scheduling Order (the “Motion”) and in support thereof respectfully show the Court as follows:

BACKGROUND FACTS

1. On November 30, 2015 (the “Petition Date”), Debtor filed its petition for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Case”).

2. On October 27, 2016, NRG filed its Application of Neal Richards Group, LLC for Allowance of Administrative Expenses Incurred in Making a Substantial Contribution to this Chapter 11 Case Pursuant to 11 U.S.C. § 503(b) [Dkt. No. 176] (the “NRG Application”).

3. The hearing on the NRG Application is scheduled for February 21, 2017. NRG, CH Realty, Debtor, Trustee, and the Limited Partner Objectors have agreed on deadlines for discovery-related efforts, all contained in the proposed Order Granting Scheduling Order Governing Contested Matter for Substantial Contribution Claim, attached hereto as Exhibit A.

REQUEST FOR RELIEF

4. NRG, CH Realty, Debtor, Trustee, and the Limited Partner Objectors request that the Court enter the proposed Order Granting Scheduling Order Governing Contested Matter for Substantial Contribution Claim. Section 105(a) of the Bankruptcy Code allows the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [Title 11]” and to take “any action or mak[e] any determination necessary or appropriate to enforce or implement court orders or rules, or to prevent an abuse of process.” *See* 11 U.S.C. § 105(a). NRG, CH Realty, Debtor, Trustee, and the Limited Partner Objectors believe that the dates and deadlines set forth in the proposed Order Granting Scheduling Order Governing Contested Matter for Substantial Contribution Claim will promote the most efficient resolution and discovery schedule. Accordingly, NRG, CH Realty, Debtor, Trustee, and the Limited Partner Objectors request that the Court enter the proposed Order Granting Scheduling Order Governing Contested Matter for Substantial Contribution Claim.

Dated: January 12, 2017

Respectfully submitted,

/s/ Jacob B. Kring

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**ATTORNEY FOR LIMITED PARTNER
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

/s/ Jacob B. Kring
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